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TO: Department of Water Resources

Attn: Kent Frame

Attn: Fethi Benjemaa

901 P Street, Suite 313A

Sacramento, CA 95814

FAX NO.: (916) 651-7059

DATE: July 26, 2011

NO. OF PAGES: 8 (includes cover sheet)

RE: Reconvening of the Agricultural
Stakeholder Committee.

3152 Shad Court
Simi Valley, CA 93063
July 26, 2011

Department of Water Resources
Attn: Kent Frame
Attn: Fethi Benjemaa
901 P Street, Suite 313A
Sacramento, CA 95814

Re: Reconvening of the Agricultural Stakeholder Committee.

Dear Mr. Frame, and Fethi Benjemaa:

I am very grateful that the meetings are restarting on August 3, 2011 (noted in the July 20, 2011 California Water Plan eNews DWR Website section). It is of the utmost importance that the Committee's Agricultural Water Use Efficiency Project work not be discontinued before the Agricultural Water Management Plan Guidebook is approved.

Since the Draft Agricultural Water Management Plan Guidebook is on the Committee's Agenda, enclosed is a copy of my July 20, 2011 letter to Mr. John Laird, Secretary of the Natural Resources Agency for the members consideration.

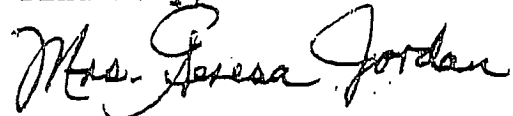
Mr. Frame, and Fethi Benjemaa, I am grateful for the "Response to comments on the Emergency Agricultural Water Measurement Regulation" (posted on the DWR Website). I kindly request a response to my June 27, 2011 letter's comment opposing the use of years 2012 and 2015 as two Agricultural Water Management Plan records retention cycles since a cycle is 5 years.

Mr. Frame, and Fethi Benjemaa, at the July 25, 2011 Ventura County Waterworks District No. 8 (City of Simi Valley) Board of Directors meeting, 2010 meter service charges were rescinded for former Agricultural customers. Those former VCWWD No. 8 (City of Simi Valley) customers, were placed into the Commercial category because the Agricultural category was eliminated. The meter service charges approved on December 2009 led to astronomical financial impacts on the former Agricultural customers because many of them put in larger meters which increases the cost considerably. I recently read the "Response to

questions made during ASC and Subcommittee Meetings" (posted on the DWR Website). The DWR response to "Q10" states "The pricing structure should be based on the quantity measured but may include other considerations to set the price of water. Adoption of pricing structure and policy are not part of this regulation". While adoption of pricing structure and policy are not part of the regulation, the elimination of "Agricultural" customers, and placing them under the "Commercial" customer category is disconcerting. Perhaps this situation is occurring throughout the State. Perhaps this situation is occurring in order for water suppliers to not have to compile 2012 Agricultural Water Management Plans. Perhaps this situation is occurring in order to lessen agricultural lands so that future residential, commercial, industrial, and/or institutional projects development can take place on those properties.

Mr. Frame, and Fethi Benjemaa, I was delighted to see that the Draft Agricultural Water Management Plan includes a Terrain and Soils (Section 10826(a)(3)). Not all of the local water suppliers' 2010 Urban Water Management Plans that I read included such information. Description of water suppliers' service area topography is important. I did not find a section in the 2010 Urban Water Management Plan Guidebook. Did I miss the information, or did State law previously include it, and was later deleted? The public should not have to thumb through past Urban Water Management Plans in order to find this information if it was required. Continuity of information is also vital.

Sincerely,



Mrs. Teresa Jordan

Enclosures:

July 20, 2011, Letter to Mr. John Laird, Secretary of the Natural Resources Agency. (3 Pages)

July 25, 2011, Letter to the Ventura County Waterworks District No.8 Board of Directors/Simi Valley City Council Members; Agenda Item 2C(Adopt Resolution to Rescind Meter Service Charges). (2 Pages)

3152 Shad Court
Simi Valley, CA 93063
July 20, 2011

Mr. John Laird, Secretary
CA Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 91854

Re: The Department of Water Resources Water Use Efficiency
SB X7-7 Agency Team's Draft Agricultural Water
Management Plan Guidebook Discussions.

Dear Mr. Laird:

Since the DWR SB X7-7 Agency Team's Draft Agricultural Water Management Plan Guidebook July 13, 2011 meeting Agenda item discussion has passed, and because there are no additional meetings on the Calendar for the group planned at this writing, I am writing to you to convey my comments on the Draft Agricultural Water Management Plan Guidebook. Please note that my comments come as a result of reading and commenting on local water districts' 2010 UWMPs.

DRAFT AGRICULTURAL WATER MANAGEMENT PLAN GUIDEBOOK(5/26/11)

- #1 - Page 3, under Guidebook Objectives and Use, it is stated that "The objective of this guidebook is to assist agricultural water suppliers in preparing their Agricultural Water Management Plans and to meet the requirements of the Water Conservation Bill of 2009(SBX7-7). Specifically, the objectives are: ...Provide specific guidelines that provide details to support compliance with the Water Conservation Bill of 2009". The DWR Website dedicated to SENATE BILL 7(SBX7-7(SBx7-7 2009)) states "Water Conservation Act of 2009". The DWR Emergency Rulemaking Agricultural Water Measurement Regulations(OAL File No. 2011-0624-01E, Chapter 5.1, Sections 597 to 597.4 public notice stated "TITLE 23. WATERS DIVISION 2. DEPARTMENT OF WATER RESOURCES CHAPTER 5.1 WATER CONSERVATION ACT OF 2009 NOTICE OF PROPOSED EMERGENCY RULEMAKING".

The Department of Water Resources' Agricultural Water Management Plan Guidebook must be consistent with the SBX7-7 title in order for the agricultural water suppliers to submit AWMPs with the legal Senate Bill's language. Documents must not only inform but also be consistent in order to not confuse the readers.

The Department of Water Resources' 2010 Urban Water Management Plan Guidebook refers to SBX7-7 as the "Water Conservation Bill of 2009", yet the Senate Bill's title differed substantially in the 2010 Urban Water Management Plans from the Calleguas Municipal Water District, the Camrosa Water District, the Ventura County Waterworks District No. 1, and the Ventura County Waterworks District No. 8 (City of Simi Valley), as well as in the 2010 Integrated Regional Urban Water Management Plan for the Antelope Valley. Some water suppliers adopted 2010 UWMPs have the Senate Bill's year of adoption incorrect, others don't even provide it.

- #2 - Page 7, under Plan Adoption, Submittal, and Implementation (Section 10841), it is stated that "...supplier shall make the proposed plan available for public inspection, and hold a public hearing on the plan. Prior to the hearing, notice of the time and place of hearing is to be published within the jurisdiction of the publically owned water supplier once a week for two successive weeks (see Section 6066 of the Government Code: <http://law.onecle.com/California/government/6066.html>)..."

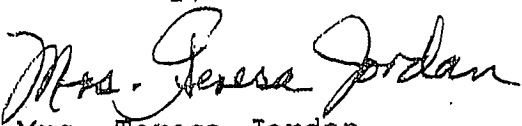
It was unfortunate that the length of time for the public review and comment period process of the 2010 UWMPs was not written into the Senate Bill because it takes a lot of time to cross-reference documents, or to read through the Draft and Final Plans in a timely manner before the public hearing is held. The Camrosa Water District, and the Calleguas Municipal Water District 2010 UWMP Updates legal public notices were superb. The Ventura County Waterworks District No. 8 (City of Simi Valley)'s legal public notice was very disappointing. I never

found the Ventura County Waterworks District No. 1's legal public notice.

I addressed the 2010 UWMP Updates for the Camrosa Water District, the Ventura County Waterworks District No. 1, and the Ventura County Waterworks District No. 8 (City of Simi Valley). Even though I submitted my comments on the Plans before the public hearings were held, I did not receive a response from the water districts' staff. I finally received responses to my letters from the Ventura County Waterworks District No. 8 (City of Simi Valley)'s staff, but only because the City Council members/district Board of Directors continued the public hearing. Only one of my letters on the Ventura County Waterworks District No. 1's 2010 UWMP Update was posted on the district/County Board of Supervisors' Website even though they were submitted before the public hearing was held.

- #3 - The final AWMP Guidebook must also be consistent throughout with regards to the bullet point statements; punctuation or no punctuation--period("."), or comma(",")--at the end of each item. Example: Page 3.
- #4 - The final AWMP Guidebook must also be consistent throughout with regards to the sections and subsections titles; underline or not.
- #5 - The final AWMP Guidebook must also be consistent throughout with regards to the sections and subsections titles; capitalize or not the first letter of each word.
- #6 - Page 3, under Guidebook Table of Contents, "(To be completed)" was mindboggling since the draft Plan's sections and subsections could have been compiled into a Table of Contents format.

Sincerely,


Mrs. Teresa Jordan